EXHIBIT "1"

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

WEIHARIK GARCIA, individually and on behalf of all others similarly situated,
 	
               Plaintiff,
 	
    v.
 	
SOUTH SHORE HYUNDAI, LLC
 	
               Defendant.
	Civil Action No. 2:24-cv-01305

DECLARATION IN SUPPORT OF MOTION TO DISMISS

I , Sandra Dellolio do hereby declare and state as follows:

1.   I am the Internet Director for the Atlantic Auto Group which owns JS Hyundai of Valley Stream, LLC d/b/a South Shore Hyundai ("SSH"). In my work with the Atlantic Auto Group, I have become familiar with the records maintained by SSH relative to its marketing and customer retention efforts. I have reviewed the records maintained by SSH relative to a text message that was sent to the Plaintiff in this action, Weiharik Garcia.

2.   Ms. Garcia indicates in her Class Action Complaint that the telephone number at which she received the texts at issue is part of the 484 area code. SSH's records indicate that Ms. Garcia's full telephone number is (484) 838-9266.

3.   The Federal Trade Commission ("FTC") maintains a website at https://www.donotcall.gov/verify.html that is available to the public and enables users to verify whether and when a particular telephone number was added to the Do Not Call Registry. A true and accurate screenshot of the website is attached as Exhibit A.

<div align="center">1</div>

4.   To verify whether and when a telephone number was added to the Do Not Call Registry, a user enters up to three telephone numbers to be searched, along with an email address to which results of the search will be sent.

5.   Upon initiation of a search, the FTC website sends an email to the user with the results of the search, which includes confirmation when a particular phone number was registered with the Do Not Call Registry and the date upon which the number was registered.

6.   I have performed a verification search for the registration status of Ms. Garcia's telephone number on the Do Not Call Registry using the FTC website. To perform this search, I entered Ms. Garcia's cell phone number, (484) 838-9266, into the FTC's Do Not Call Registry search website along with my email address sdellolio@aagny.net. A true and accurate screenshot showing the inputs for this search is attached as Exhibit B.

7.   I received the results of the verification search for the registration status of MS. Garcia's telephone number (484) 838-9266 shortly after I initiated the search. The results came in the form of an email sent by the Do Not Call Registry to my email address. A true and accurate screenshot of the email in my inbox is attached as Exhibit C.

8.   The results I the email that I received from the Do Not Call Registry indicate that Ms. Garcia's telephone number (484) 838-9266 is presently registered with the Do Not Call Registry but that the number was not registered with the Do Not Call Registry until April 12, 2024. A true and accurate screenshot of the email results is attached as Exhibit D.

Signed under the pains and penalties of perjury this __ day of June 2024

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3

EXHIBIT A

FEDERAL TRADE COMMISSION
PROTECTING AMERICA'S CONSUMERS

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National Do Not Call Registry

En Español

VERIFY YOUR REGISTRATION

You can verify if and when your phone number was registered.

Follow the verification steps below.

1. Enter up to three phone numbers and your email address. Click Submit.
2. Check whether the information is correct.
3. Receive an email with the verification information.

STEP 1 OF 3

Phone Number 1: `Enter only numbers, e.g. 2025550100`

Phone Number 2 (optional): `Enter only numbers, e.g. 2025550100`

Phone Number 3 (optional): `Enter only numbers, e.g. 2025550100`

Email Address:

SUBMIT

Your email address MUST be correct to process your verification. Learn why your email address is required. If you do not receive the verification email within a few minutes, please check your spam filter or junk email folder.

Please enter only numbers in Phone Number field.

EXHIBIT B

FEDERAL TRADE COMMISSION
PROTECTING AMERICA'S CONSUMERS

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National Do Not Call Registry

En Español

VERIFY YOUR REGISTRATION

You can verify if and when your phone number was registered.

Follow the verification steps below.

1. Enter up to three phone numbers and your email address. Click Submit.
2. Check whether the information is correct.
3. Receive an email with the verification information.

STEP 1 OF 3

Phone Number 1:	4848389266
Phone Number 2 (optional):	Enter only numbers, e.g. 2025550100
Phone Number 3 (optional):	Enter only numbers, e.g. 2025550100
Email Address:	sdellolio@aagny.net

SUBMIT

Your email address MUST be correct to process your verification. Learn why your email address is required. If you do not receive the verification email within a few minutes, please check your spam filter or junk email folder.

Please enter only numbers in Phone Number field.

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National Do Not Call Registry

En Español

VERIFY YOUR REGISTRATION

STEP 2 OF 3

Make Sure Your Information is Correct

Please check your phone number(s) and email address below. If they are correct, click Verify to continue. To make a correction, click Change.

Your email address MUST be correct to verify your registration.

| Phone Number 1: | **4848389266** |
| Email Address: | **sdellolio@aagny.net** |

VERIFY   **CHANGE**

FEDERAL TRADE COMMISSION
PROTECTING AMERICA'S CONSUMERS

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National Do Not Call Registry

En Español

VERIFY YOUR REGISTRATION

STEP 3 OF 3

Receive an Email

You should receive an email from Verify@donotcall.gov within a few minutes.

If your phone number is registered, the email will tell you the date of registration. If your phone number is not registered and you want it to be, use this Web site.

You can close this browser window when completing the verification process.
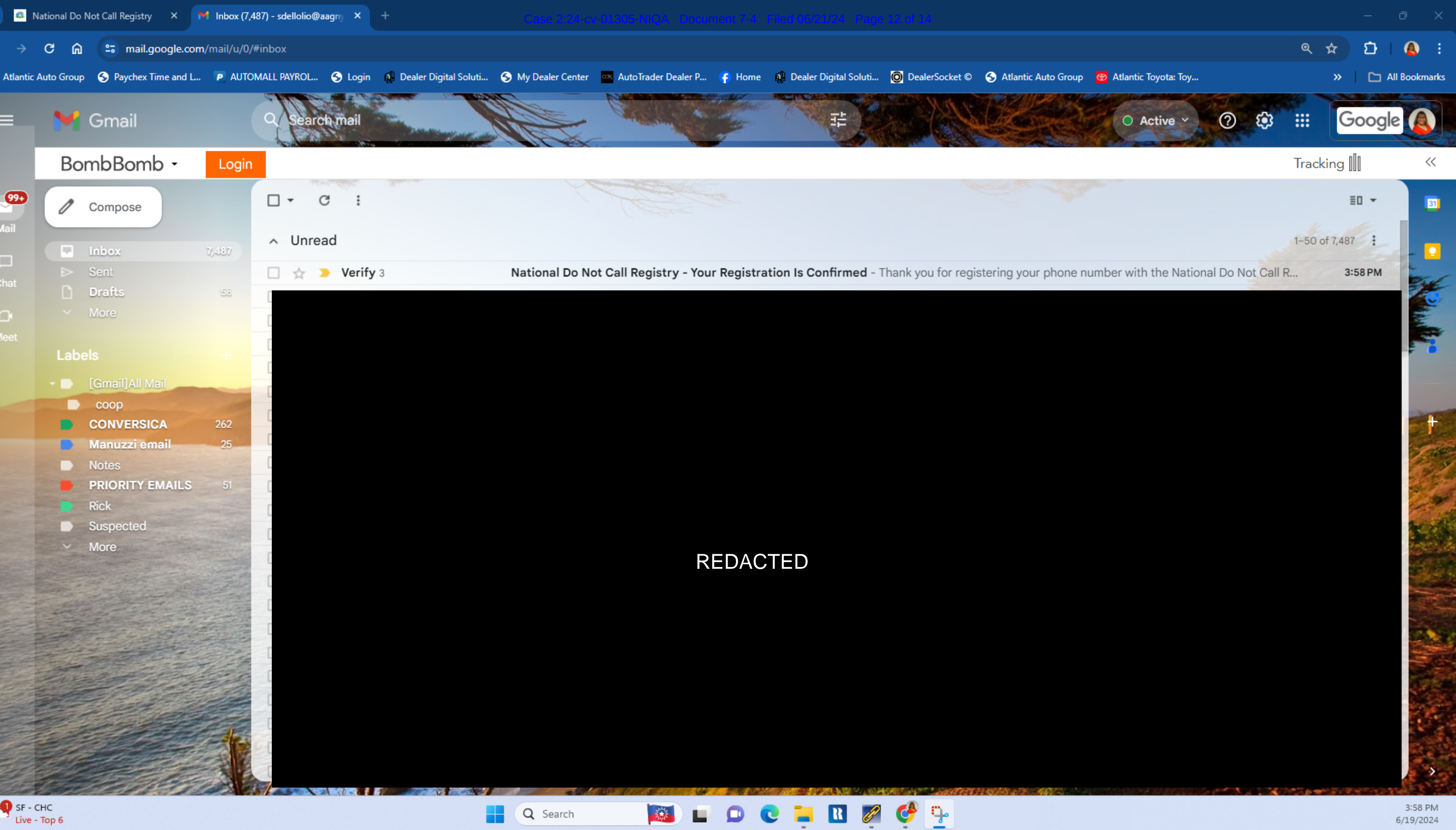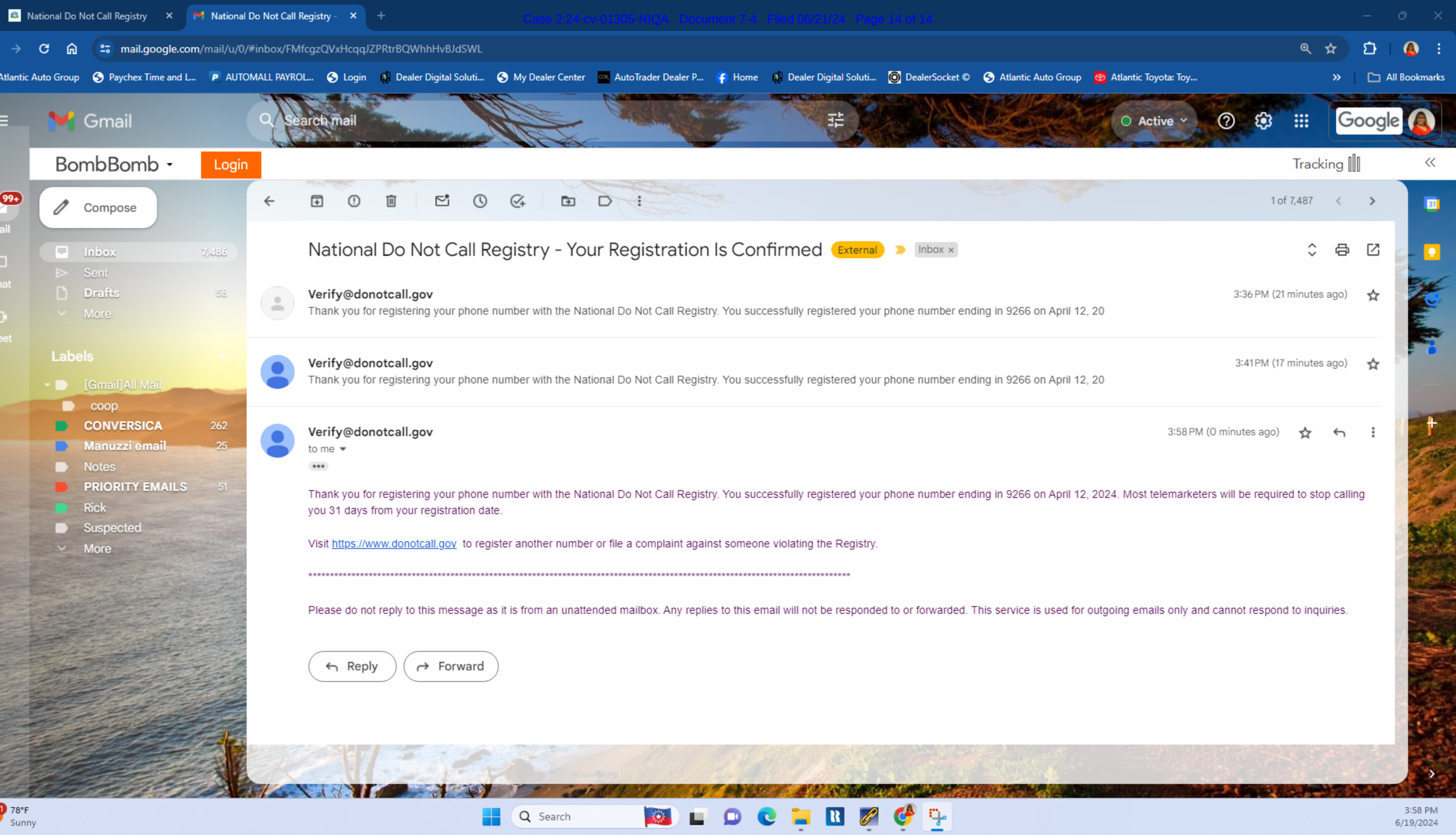
Back to ftc.gov | Privacy Policy

EXHIBIT C

REDACTED

EXHIBIT D

National Do Not Call Registry

National Do Not Call Registry -

mail.google.com/mail/u/0/#inbox/FMfcgzQVxHcqqJZPRtrBQWhhHvBJdSWL

Atlantic Auto Group | Paychex Time and L... | AUTOMALL PAYROL... | Login | Dealer Digital Soluti... | My Dealer Center | AutoTrader Dealer P... | Home | Dealer Digital Soluti... | DealerSocket © | Atlantic Auto Group | Atlantic Toyota: Toy... | All Bookmarks

Gmail

Search mail

Active

BombBomb

Login

Tracking

Compose

Inbox 7,486
Sent
Drafts 58
More

1 of 7,487

National Do Not Call Registry - Your Registration Is Confirmed External Inbox ×

Verify@donotcall.gov 3:36 PM (21 minutes ago)
Thank you for registering your phone number with the National Do Not Call Registry. You successfully registered your phone number ending in 9266 on April 12, 20

Verify@donotcall.gov 3:41 PM (17 minutes ago)
Thank you for registering your phone number with the National Do Not Call Registry. You successfully registered your phone number ending in 9266 on April 12, 20

Labels

[Gmail]All Mail
coop
CONVERSICA 262
Manuzzi email 25
Notes
PRIORITY EMAILS 51
Rick
Suspected
More

Verify@donotcall.gov 3:58 PM (0 minutes ago)
to me

Thank you for registering your phone number with the National Do Not Call Registry. You successfully registered your phone number ending in 9266 on April 12, 2024. Most telemarketers will be required to stop calling you 31 days from your registration date.

Visit https://www.donotcall.gov to register another number or file a complaint against someone violating the Registry.

****

Please do not reply to this message as it is from an unattended mailbox. Any replies to this email will not be responded to or forwarded. This service is used for outgoing emails only and cannot respond to inquiries.

Reply   Forward

78°F
Sunny

Search

3:58 PM
6/19/2024